

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

OPTOTRAFFIC, LLC,	)	CASE NO. 1:13-cv-00636
	)	
Plaintiff,	)	JUDGE DLOTT
	)	MAGISTRATE JUDGE BOWMAN
	)	
vs.	)	
	)	<b><u>UNOPPOSED MOTION FOR</u></b>
SHERIFF JIM NEIL, in his official capacity	)	<b><u>EXTENSION OF TIME</u></b>
as Sheriff of Hamilton County,	)	<b><u>TO FILE OPPOSITION BRIEF/</u></b>
et al.,	)	<b><u>REPLYBRIEF</u></b>
	)	
Defendants.	)	

Plaintiff Optotraffic, LLC moves the Court for an extension of time until Monday, November 4, 2013, in which to file a memorandum in opposition to the County Defendants' Motion to Dismiss and an attendant reply brief in support of Optotraffic's Motion for Preliminary Injunction. The County Defendants filed their Motion to Dismiss and brief in opposition to the Motion for Preliminary Injunction on October 16, 2013, and Optotraffic's briefs are due October 30, today. Just this morning, the First District Court of Appeals issued orders concerning the current appeal pending before that court and the Optotraffic equipment at issue. These orders may affect the scope of the issues presented in the pending motions before this Court, and Optotraffic requests leave in order to fully digest the First District orders and revise its motion papers appropriately, if necessary.

Optotraffic has conferred with counsel for the County Defendants, who have no objection to this request.

Respectfully submitted,

/s/John M. Alten

---

Joseph A. Castrodale (0018494)  
John M. Alten (0071580)  
Laura C. McBride (0080059)  
ULMER & BERNE LLP  
1660 West 2<sup>nd</sup> Street, Suite 1100  
Cleveland, Ohio 44113  
PH: (614) 583-7000  
FAX: (614) 583-7035  
jcastrodale@ulmer.com  
jalten@ulmer.com  
lmcbride@ulmer.com

Christopher R. Heekin (0042032)  
HEEKIN & HEEKIN  
817 Main Street, Suite 200  
Cincinnati, Ohio 45202  
PH: (513) 345-5560  
FAX: (513) 345-5565  
crheekin@gmail.com

Attorneys for Plaintiff  
Optotraffic, LLC

**CERTIFICATE OF SERVICE**

I hereby certify that on October 30, 2013, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's Electronic Case Filing System or by regular mail for parties not receiving electronic notices. Parties may access this filing through the Court's Electronic Case Filing System.

/s/John M. Alten

One of the Attorneys for Plaintiff  
Optotraffic, LLC